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a/k/a Nik Richie

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE, CENTRAL JUSTICE CENTER**

EVANDER KANE,

Petitioner,

vs.

HOOMAN ABEDI KARAMIAN a/k/a NIK
RICHIE,

Respondent.

Case No. 30-2026-01575619-CU-HR-CJC

Assigned For All Purposes To: The
Commissioner Glenn Mondo
Dept. C64

**RESPONDENT NIK RICHIE'S MOTION
FOR ORDER REQUIRING PLAINTIFF
TO FURNISH AN UNDERTAKING
PURSUANT TO CAL. CODE CIV. PROC.
§ 1030**

Date: September 3, 2026
Time: 2:00 p.m.
Dept: C64
Reservation No. (74880741)

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT Respondent Nik Lamas-Richie files his motion to the Court for an order pursuant to Cal. Code Civ. Proc. § 1030 requiring Petitioner Evander Frank Kane to file an undertaking in the amount of \$100,000 to secure an award of the costs and reasonable attorney's fees that may be awarded to Respondent in this action. The Motion will be heard on September 3, 2026, at 2:00 p.m. in Department C64 of the above-identified Court, located at 700 Civic Center Drive West, Santa Ana, CA 92701. The grounds for the Motion are more distinctly stated in the accompanying Memorandum of Points and Authorities. Briefly, Petitioner resides outside the State of California and there is a reasonable possibility that Respondent will obtain a judgment in this action, within the meaning of California Code of Civil

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Procedure section 1030, subdivisions (a) and (b). If the Court grants this Motion and Petitioner fails to file the undertaking within the time ordered, this action must be dismissed. (Cal. Code Civ. Proc., § 1030(d).)

This motion is based on this Notice of Motion and Motion, the attached Memorandum, the papers and pleadings on file in this action, and such further oral and documentary evidence as may be presented at the hearing.

Dated: June 17, 2026.

Respectfully Submitted,
RANDAZZA LEGAL GROUP, PLLC
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MEMORANDUM OF POINTS AND AUTHORITIES

1.0 INTRODUCTION AND BACKGROUND

Respondent Hooman Abedi Karamian (“Richie” or “Respondent”) respectfully requests that this Court require that Petitioner Evander Kane (“Mr. Kane” or “Petitioner”) post a bond sufficient to cover Richie’s anticipated costs and reasonable attorney’s fees likely to be incurred in the defense of this action, pursuant to Cal. Code Civ. Proc. § 1030. Mr. Kane, a citizen and resident of Canada, seeks to suppress Richie’s constitutionally protected criticism of a public figure on matters of public concern. Richie is likely to prevail on a special motion to strike under Cal. Code Civ. Proc. § 425.16 (his “Anti-SLAPP Motion”), which would guarantee an award of costs and reasonable attorneys’ fees, and he will likely be awarded prevailing party fees under Cal. Code Civ. Proc. § 527.6(i). (*Krug v. Maschmeier* (2009) 91 Cal. Rptr. 3d 452, 456.) Because Mr. Kane resides outside the United States and does not appear to have attachable property within this county, a bond is necessary to ensure that Mr. Richie can recover the costs and fees to which he may be entitled.

2.0 LEGAL STANDARD

Cal. Code Civ. Proc. § 1030(a) permits courts to require “an undertaking to secure an award of costs and attorney’s fees which may be awarded in the action or special proceeding.” A motion for a bond requires that (1) the “plaintiff resides out of the state or is a foreign corporation” and (2) “there is a reasonable possibility that the moving defendant will obtain judgment in the action or in the special proceeding.” (*Id.* at § 1030(b).)

The second prong is evaluated under a liberal standard. A defendant only needs to show that it is “reasonably possible” they will win. (*Baltayan v. Estate of Getemyan* (2001) 90 Cal. App. 4th 1427, 1432 [“Respondents were not required to show that there was no possibility that appellant could win at trial, but only that it was *reasonably possible* that respondents would win”].)

California courts assess the propriety of a bond by considering “the degree of probability/improbability of success on the merits, and the background and purpose of the suit, the reasonable extent of the security to be posted viewed from both the defendants’ and plaintiffs’ perspectives, as well as the absence of attachable property within the district, the conduct of the parties, and the plaintiff’s ability to post the bond.” (*Suzhou Angela Online Game Tech. Co. v. Snail Games USA Inc.* (C.D. Cal. Mar. 9, 2023) 2023 U.S. Dist. LEXIS 40924, *18–19.

1 **3.0 ARGUMENT**

2 There is no dispute that Mr. Kane is not a California resident and is instead a citizen and
 3 resident of Canada. Nor is there any reasonable dispute that Richie is entitled to his costs and
 4 reasonable attorney’s fees if the Court grants his Anti-SLAPP. (*See* Cal. Code Civ. Proc. §
 5 425.16(c)(1) [“[A] prevailing defendant on a special motion to strike shall be entitled to recover
 6 that defendant’s attorney’s fees and costs”].) He may also be awarded his fees as a prevailing party
 7 under Cal. Code Civ. Proc. § 527.6(i) if the Court does not grant the restraining order Mr. Kane
 8 requests. For the reasons stated in the Application to Vacate this Court’s TRO and the pending
 9 Anti-SLAPP Motion, there is an extremely high likelihood that Richie will be considered the
 10 prevailing party in this proceeding. But such certainty is not needed; Richie only needs to show a
 11 reasonable chance of prevailing. (*Baltayan*, 110 Cal. Rptr. 2d at 76.) And as also explained in those
 12 motions, Mr. Kane filed this action to silence constitutionally-protected journalism that is
 13 unflattering to him, rather than to stop stalking or harassment contemplated under Cal. Code Civ.
 14 Proc. § 527.6. The purpose of this suit is illegitimate, counseling in favor of requiring a bond.

15 A bond of \$100,000 would cover Richie’s defense costs and the amount of a likely fee
 16 award. Richie has retained esteemed First Amendment counsel for this matter that has obtained
 17 significant Anti-SLAPP fee awards in jurisdictions with lower customary hourly rates for counsel
 18 than here. (*See, e.g., Guo v. Cheng* (Nev. Eighth Jud. Dist. Ct., June 5, 2020) No. A-18-779172-C
 19 [awarding \$184,955.55 in Anti-SLAPP fees]; *Las Vegas Resort Holdings, LLC v. Roeben* (Nev.
 20 Eighth Jud. Dist. Ct., Dec. 30, 2020) No. A-20-819171-C [awarding \$93,573 in Anti-SLAPP fees];
 21 *Lazer v. Williams* (Nev. Eighth Jud. Dist. Ct. Feb. 17, 2022) No. A-19-797156-C [awarding
 22 \$164,450 in Anti-SLAPP fees]; *Houtsinger v. US Support LLC* (Josephine Cty., OR Cir. Ct., Mar.
 23 17, 2026) No. 24CV49697 [awarding \$76,866 in Anti-SLAPP fees in rural Oregon].) There is no
 24 reason to think a fee award here would be lower, particularly if Mr. Kane decides to appeal an
 25 unfavorable order.

26 Furthermore, there is no doubt Mr. Kane would be able to post such a bond. He is a
 27 professional hockey player of international renown who has retained very sophisticated—and very
 28 expensive—counsel and who, despite having declared bankruptcy, has listed over \$10 million in
 29 assets. A \$100,000 bond should not impose a significant hardship on him.

1 **4.0 CONCLUSION**

2 For the foregoing reasons, Respondent Nik Lamas-Richie requests that this Court grant this
3 Motion and require Petitioner Evander Kane to post a bond in the amount of \$100,000.

4
5 Dated: June 17, 2026.

6 Respectfully Submitted,

7 RANDAZZA LEGAL GROUP, PLLC

8 /s/ Alex J. Shepard

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PROOF OF SERVICE

Kane v. Karamian | Orange County Superior Court

At the time of service, I was over the age of 18 and not a party to this action. I am employed in the County of Clark, State of Nevada. My business address is Randazza Legal Group, PLLC, 8991 W. Flamingo Rd., Ste. B, Las Vegas, NV 89147.

On June 17, 2026, I served true and correct copies of the foregoing document on all interested parties in this action as stated on the attached service list.

BY ELECTRONIC MAIL. I electronically served the documents listed above to the persons at the electronic mail addresses listed above, from my electronic service address, <ajs>@randazza.com.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on June 17, 2026, at Las Vegas, Nevada.

/s/ Alex J. Shepard
Alex J. Shepard

SERVICE LIST

***Kane v. Karamian* | Orange County Superior Court
Case No. 30-2026-01575619-CU-HR-CJC**

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